

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DANIEL KARON, individually and on )  
behalf of all others similarly situated, )  
v. ) Case No.18-cv-2658-CAB  
PALMER ADMINISTRATIVE SERVICES, INC., )  
ET AL., )  
Defendants. )

**MOTION TO APPEAR *PRO HAC VICE* FOR MITCHELL N. ROTH**

In accordance with Local Rule 83.5(h), the undersigned respectfully moves for the admission *pro hac vice* of Mitchell N. Roth of the law firm of Roth Jackson Gibbons Condlin, PLC, located at 8200 Greensboro Drive, Suite 820, McLean, Virginia 22102, (703) 485-3536, for purposes of appearance as co-counsel on behalf of Palmer Administrative Services, Inc. in the above-styled case only, and in support thereof states as follows:

1. Mitchell N. Roth is not admitted to practice in the Northern District of Ohio and is a member in good standing of the Bar of the Commonwealth of Virginia, and, as reflected in his accompanying affidavit, is admitted to practice in, and is in good standing to practice in, the Supreme Court of Virginia.

2. Movant, Benjamin D. Carnahan, Esquire, of the law firm of Dinn Hochman and Potter, LLC. located at 5910 Landerbrook Drive, Suite 200, Cleveland, Ohio 44124, (440) 544-1135, is a member in good standing of The Ohio Bar and the United States District Court for the Northern District of Ohio and is authorized to file through the Court's electronic filing system.

3. In accordance with the local rules of this Court, Mitchell N. Roth has made payment of this Court's \$120 admission fee. An affidavit in accordance with Rule 83.5(h) is attached hereto.

WHEREFORE, Benjamin D. Carnahan, moves this Court to enter an Order authorizing Mitchell N. Roth to appear before this Court on behalf of Palmer Administrative Services, Inc. for all purposes relating to the proceedings in the above-styled matter.

Date: February 8, 2019

Respectfully submitted,

/s/ Benjamin D. Carnahan  
Benjamin D. Carnahan (0079737)  
bcarnahan@dhplaw.com  
Dinn Hochman and Potter, LLC  
5910 Landerbrook Drive, Suite 200  
Cleveland, Ohio 44124  
T: (440) 544-1135  
F: (440) 446-1240  
*Attorneys for Palmer Administrative Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8<sup>th</sup> day of February 2019, a copy of the foregoing document was served via Electronic Court Filing (ECF), upon:

Katrina Carroll, Esq.  
111 W. Washington Street  
Suite 1240  
Chicago, IL 60602

And

Adam Savett, Esq.  
2764 Carole Lane  
Allentown, PA 18104  
*Counsel for Plaintiff*

DINN HOCHMAN & POTTER, LLC:

/s/ Benjamin D. Carnahan  
BENJAMIN D. CARNAHAN (0079737)  
*Attorneys for Defendant*  
*Palmer Administrative Services, Inc.*